



Seyfarth Shaw LLP

620 Eighth Avenue

New York, New York 10018

T (212) 218-5500

F (212) 218-5526

esalcedo@seyfarth.com

T (212) 218-5600

[www.seyfarth.com](http://www.seyfarth.com)

May 29, 2025

**VIA ELECTRONIC FILING**

The Honorable Analisa Torres  
The United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Pinnacle Madison Avenue Corporation v. Italian Trade Agency, 22-cv-3841**

Honorable Judge Torres:

We represent Petitioner, Pinnacle Madison Avenue Corporation, (“Petitioner”) in the above-referenced action. We write with respect to the Court’s Order of yesterday, May 28, 2025, granting Respondent’s request for a temporary restraint of Your Honor’s February 3, 2025 Order, and setting an extended briefing schedule on the underlying motion for a stay pending appeal.

As the Court is aware from our May 16 status letter (Dkt. 57), Respondent has willfully violated the February 3, 2025 Order for months, refusing to permit Petitioner the discrete, non-invasive access necessary to proceed with construction work that has already been delayed for over three years. Despite its prolonged noncompliance, Respondent waited months following the Order to file its baseless motion and has consistently acted to delay and prejudice Petitioner’s rights.

Accordingly, Petitioner respectfully requests that the Court modify its May 28 Order to adopt the following new briefing schedule: (i) Petitioner’s opposition due June 16; (ii) Respondent’s reply due June 23, and (iii) set a conference with the parties (including principals) as soon as practicable thereafter, consistent with the Court’s original intent.

We thank the Court for its continued attention to this matter and remain available should Your Honor have any questions or require any additional information.



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Respectfully Submitted,

SEYFARTH SHAW LLP

*/s/ Eddy Salcedo*

Eddy Salcedo

cc: Luca CM Melchionna, Esq. (via electronic filing)